

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

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Docket No. R97-1

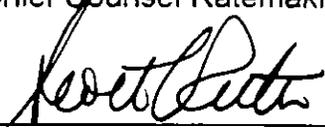
RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORIES OF
NASHUA PHOTO INC. ET AL.
(NDSM/USPS-T4-19-21)

The United States Postal Service hereby provides responses of witness Moden to the following interrogatories of Nashua Photo Inc., et al.: NDMS/USPS-T4-19-20, filed on September 9, 1997, and NDMS/USPS-T4-21, filed on September 15.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

By its attorneys:
Daniel J. Foucheaux, Jr.
Chief Counsel Ratemaking



Scott L. Reiter

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(202) 268-2999 FAX -5402
September 23, 1997

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF NASHUA PHOTO INC., DISTRICT PHOTO INC.**

NDMS/USPS-T4-19. Please refer to your response to OCA/USPS-T4-5, which identifies "New Design Flat Sorting Machines" among various mail processing equipment planned for deployment by the end of FY 1999.

- a. Will this new flat sorter be equipped with a high speed flat feed mechanism? If so, please describe its capabilities. If not, how will flats be inducted into the machine?
- b. Please provide a comparison of the new flat sorter with both the FSM 881 and FSM 1000 in terms of
 - (i) throughput per hour;
 - (ii) number of stackers/separations;
 - (iii) staffing requirements;
 - (iv) minimum and maximum dimensions of mail pieces accepted;
 - (v) flexibility requirements for mailpieces inducted into the machine; and
 - (vi) perceived advantages/improvements offered by the new flat sorter.
- c. Will the new flat sorter be deployed as a replacement for either the FSM 881 or the FSM 1000, or in addition to the FSM 881s and FSM 1000s that are already deployed or scheduled for deployment? Please explain fully how the new flat sorter affects and fits into the Postal Service's plans for the mechanized/automated sortation of flats.
- d. Does the new flat sorter represent (i) automated or (ii) mechanized processing of flats? If the latter is your response, please explain what would be required in order for flats processing to reach the threshold that the Postal Service regards as automated processing.

Response:

- a. As indicated in my response to NDMS/USPS-T4-14(b), I am told that the Postal Service has reviewed some existing flat sorters that are used by other Postal institutions. Also, as I mentioned in my response to OCA/USPS-T4-5, New Design Flat Sorting Machines are planned for deployment by the end of FY 1999. However, these statements should not be interpreted to mean that a decision has been made on this equipment and that the equipment will be deployed in the time frame mentioned. The list of planned equipment

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deployments, that was provided in response to OCA/USPS-T4-5, depicts equipment that the Postal Service is evaluating and/or considering for the future. Only after thorough evaluation will the Postal Service pursue deployment of any of this equipment. Moreover, all major equipment deployments must be approved by the Board of Governors and to assume that a machine will be deployed just because we are evaluating and/or considering it is premature. Therefore, any comparisons between FSMs used today and a new design FSM, the configuration of which we have not yet determined, is impossible.

- b. Not applicable. See 19 (a).
- c. Not applicable. See 19 (a).
- d. Not applicable. See 19 (a).

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NDMS/USPS-T4-20. Please see NDMS/USPS-T4-2 and your response thereto.

- a. How many SPBSs now have barcode readers?
How many of these SPBSs have been deployed at (i) BMCs? (ii) P&DCs?
- b. How many SPBSs have been deployed at (i) BMCs? (ii) P&DCs?
- c. Please explain whether (and when) SPBSs are used for incoming secondary sortation at P&DCs.

Response:

- a. I am told that there are four SPBSs with barcode readers. None of them are deployed at BMCs; two of them are deployed at AMCs; and two of them are deployed at P&DCs.
- b. I am told that there are 26 SPBS deployed at BMCs and that the remainder of the SPBSs, as indicated by AUTO in the response to OCA/USPS-T4-20(b), are located at either AMCs or P&DCs. However, I do not have information on how many are at AMCs as opposed to how many are at P&DCs.
- c. Generally, SPBS are not used for incoming secondary sortation at P&DCs.

NDMS/USPS-T4-21. Please refer to your response to DMA/USPS-T4-31(b). Please identify the sources of the last two pages of service performance data provided, regarding Express Mail and Priority Mail.

Response:

The source for the Express Mail data was the Electronic Marketing Reporting System (EMRS). The source for the Priority Mail data was the Origin & Destination Information System (ODIS).

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/23/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Scott L. Reiter", is written above a solid horizontal line.

Scott L. Reiter

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